Title: Joint Lean Event - Streamlining State Implementation Plan (SIP) Submittals Submissions and Approvals



<u>Summary</u>

Joint Lean Event with EPA Region 1 and the States to create a more effective SIP submittal process

Team

EPA

Sheryl Rosner (Cofacilitator) Linda Darveau (Cofacilitator) Ariel Garcia Leiran Biton

Vermont DEC Megan O'Toole Bennet Leon

Richard Burkhart

Maine DEP
Jeff Crawford

NH DES

Dan Hrobak (Co-Facilitator) Felice Janelle Vince Perelli

BACKGROUND

This Lean event follows an EPA HQ and EPA Region 1 Lean event on increasing the efficiency of the SIP process.

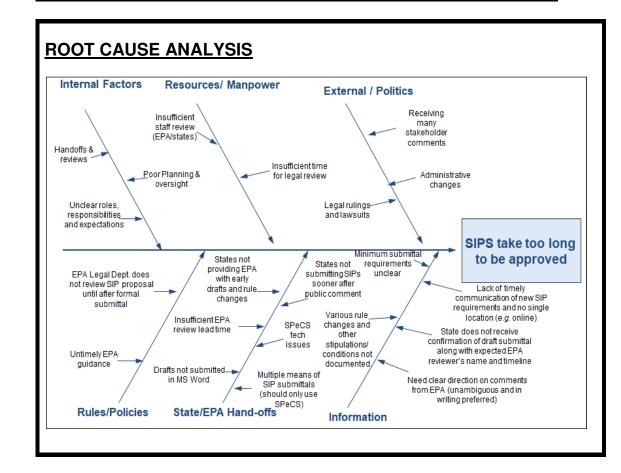
This Lean event focused on how the SIP process can be streamlined with a focus on what happens prior to when the SIP proposal is formally delivered to EPA for review.

CURRENT CONDITIONS

- The process of getting approvable SIPs from states and approvals from EPA is too long.
- Expectations and communications (handoffs) between states and EPA are unclear and could be improved
- Both states and USEPA spend much too much time reviewing and reworking draft SIPs

GOAL

- Clearly defined process for submitting approvable SIPs
- Reduction in time for entire SIP process (submission through final approval)
- Root cause analysis of why SIP submittals are not readily processed for approval



Implementation Plan Manager(s):

Ariel Garcia (USEPA), Felice Janelle (NH), Bennett Leon (VT),

Jeff Crawford (ME)

<u>PLAN</u>				
ID#	Action	Owner	Start Date	Target Date
1	SIP Forecast P&C relayed to state staff	Vince, Felice,	May	Sept 1
2	Checklist or agenda for Kickoff Meeting	Leiran,	March 27	April 27
3	Usefulness of SPeCS	Ariel	March 27	May 29
4	EPA Legal review of draft to address approvability questions	Dave Conroy	March 27	June 27
5	Update Tables of State Historical reg changes	Ariel, VT, ME, NH	March 27	June 27
6	EPA-Make clear statements during letter writing	Leiran, Ariel to discuss with Dave Conroy	March 27	May 29
7	Communicate with Other New England states	Bennet	March 27	April NESCAUM meeting
8	Develop SOP for new process	Sheryl, Felice	March 27	June 27



Recommended Process Changes

- State notifies EPA of SIP forecast via SPeCS and P&C List prior to decision to submit SIP
- State e-mails EPA Manager who is working on draft SIP
 - o EPA acknowledges receipt and notifies State as to who will work on the SIP review
 - o EPA and State schedule kick-off meeting/con-call
- State e-mails draft through SPeCS instead of e-mail
- Possible con-call and or kick-off meeting w/ EPA/States on minimum requirements
- Ensure that P&C List/SPeCS includes SIP list
- Earlier EPA legal review
- Just before submittal, state staff reviews SIP submittal completeness checklist
- EPA to make more clear what is approvable and not for proposed SIPs

Date of Event: March 27, 2018